

## Remarks

Claims 1 and 4-15 are now pending in this application. Applicants have amended claims 1, 8, 11, 12, and 13 and cancelled claims 2 and 3 to clarify the claimed invention. Applicants respectfully request favorable reconsideration of this application.

With respect to the objection to the specification and rejection under 35 U.S.C. § 101, Applicants have amended claim 13 to clarify that the computer program product includes computer software instructions stored in a device and a control system. This is clearly described in the specification and shown in the drawings. Accordingly, Applicants respectfully request withdrawal of the objection to the specification and rejection under 35 U.S.C. § 101.

Regarding the objection to the claims, Applicants have amended the claims to ensure that the world wide web presentation unit is consistently recited in the claims. Accordingly, Applicants respectfully request withdrawal of the objection to the claims.

The Examiner rejected claims 1-8, 10, 12, 13 and 15 under 35 U.S.C. § 103(a) as being unpatentable over WO 01/02953 to Andersson, Topp et al. in view of Varadarajan et al. and in view of Fielding et al. The Examiner rejected claims 9 and 14 under 35 U.S.C. § 103(a) as being unpatentable over Andersson, Topp et al. in view of Varadarajan et al. and in view of Fielding et al. and further in view of Bratthall et al.

The combination of Andersson, Topp et al., Varadarajan et al. and Fielding et al. does not

suggest the claimed invention since, among other things, the combination does not suggest generating a web request for the function of the real world object with a world wide web presentation unit installed on a device and transmitting the web request from the device through a network. Andersson requires that specific software modules be installed on a client device in order to access an application integrated in a system. Combining Andersson with a web presentation unit does not make sense since Andersson requires the use of the software modules in the client and interaction with the software modules by the rest of the system. Modifying Andersson as suggested in the office action would be only in hindsight in view of the advancements of the claimed invention. Additionally, since Andersson provides a workable solution to the problem, there is no motivation for making the suggested modifications.

Additionally, Andersson provides a method of integrating an application in a computerized system and the system is made for interacting with the particular application. Therefore, modifying Andersson as suggested in the office action to include a generic world wide web presentation unit is contrary to Andersson. Furthermore, the modifications suggested in the office action would not address the requirement that Andersson has for the system to interact with a specific software modules. Additionally, Andersson does not include any suggestion of how to resolve access to an aspect of an aspect object via the internet or via an intranet based on internet technology such as the world wide presentation unit recited in the claims.

The combination of Andersson, Topp et al., Varadarajan et al. and Fielding et al. does not suggest a web request including contextual information regarding the device and characteristics

of the world wide web presentation unit. Fielding et al. only includes a vague statement regarding transitions between protocols. This statement does not suggest including contextual information regarding the device and characteristics of the world wide web presentation unit so that the messages will be adapted to various devices, whether a mobile phone, PDA, lap top or desk top computer. The adaptability of the claimed invention facilitates control of real world objects connected to a control system through a web browser on any device capable of running a web browser. The combination of references does not suggest such adaptability.

The combination of Andersson, Topp et al., Varadarajan et al., Fielding et al., and Bratthall et al. does not suggest the invention recited in claims 9 and 14 since, among other things, Bratthall et al. does not overcome the above-described deficiencies of Andersson, Topp et al., Varadarajan et al., and Fielding et al. Along these lines, Bratthall et al. does not suggest generating a web request for the function of the real world object with a world wide web presentation unit installed on a device and transmitting the web request from the device through a network or including contextual information regarding the device and characteristics of the world wide web presentation unit. The Examiner only cites Bratthall et al. as suggesting a web browser installed on a wireless device. Such a web browser does not suggest the elements of control of real world objects through a web browser, web server and control system. Therefore, the combination of Andersson, Topp et al., Varadarajan et al., Fielding et al., and Bratthall et al. does not suggest the invention recited in claims 9 and 14.

In view of the above, the references relied upon in the office action do not suggest patentable features of the claimed invention. Therefore, the references relied upon in the office

action do not make the claimed invention obvious. Accordingly, Applicants submit that the claimed invention is patentable over the cited references and respectfully request withdrawal of the rejections based on the cited references.

If an interview would advance the prosecution of this application, Applicants respectfully urge the Examiner to contact the undersigned at the telephone number listed below.

The undersigned authorizes the Commissioner to charge fee insufficiency and credit overpayment associated with this communication to Deposit Account No. 22-0261.

Respectfully submitted,

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